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PETER J. SHARP BOATHOUSE, INC.
150 East 42nd Street
New York, New York 10017
(212) 490-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Complaint of Andrew Harnett, as
owner of vessel M/V READY JET GO for Exoneration
from or Limitation of Liability.

and

In the Matter of Peter J. Sharp Boathouse, Inc., as owner of
the floating vessel constituting the boathouse, seeking
exoneration from or limitation of liability.

**1:06-cv-00699(LMM)(GWG)
consolidated with:**

**1:06-cv-03061(LMM)(GWG), and
1:06-cv-03062(LMM)(GWG)**

and

In the Matter of New York Rowing Association, Inc., as
owner of a 2001, coxless Empacher rowing shell, seeking
exoneration from or limitation of liability.

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AFFIDAVIT OF LAWRENCE B. BRENNAN

I, Lawrence B. Brennan, being duly sworn and deposed says:

1. I am a member of the Bar of this Court, the firm Wilson Elser Moskowitz Edelman & Dicker LLP, and I am the attorney of record for petitioner, Peter J. Sharp Boathouse, Inc., and petitioner/claimant New York Rowing Association. I am fully familiar with the facts of this matter based upon personal knowledge and review of the file maintained by my office.

2. I submit this attorney's affidavit to introduce and to summarize evidence in support of the Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, the Motion for Partial Summary Judgment on Damages, and the Motion for Partial Summary Judgment, which are filed on behalf of the New York Rowing Association and the Peter J. Sharp Boathouse.
3. The following Exhibits are annexed and respectfully submitted:

Exhibit A A complete copy of the New York Police Department's Investigation into the events underlying these proceedings

Exhibit B NOAA Sunrise/Sunset Calculation for October 24, 2005

Exhibit C Amended Third Party Claims of Nina and Lee Runsdorf against New York Rowing Association and Peter Jay Sharp Boathouse, Inc. in the Limitation Petition of Andrew Harnett, dated June 3, 2009

Exhibit D Photographs of the vessels involved in the collision on October 24, 2005

Exhibit E Inland Navigation Rules, Rule 25(d)

Exhibit F Deposition Excerpt, Mr. Vincent Houston

Exhibit G Deposition Excerpt, Mr. Edward Joyce

Exhibit H Runsdorf's Expert Report by Captain Ahlstrom, dated March 14, 2011

Exhibit I Runsdorf's Expert Report by Harriet M. Metcalf, dated March 10, 2011

Exhibit J Runsdorf's Expert Report by Stephen W. Shulman, dated March 18, 2011. (Includes report and certain exhibits and appendices contained in pages 1-47; additional appendices have been omitted for brevity but were circulated to all parties during discovery)

Exhibit K Ken Cohen Summary, E-Mails

Exhibit L Court Order, dated February 4, 2011

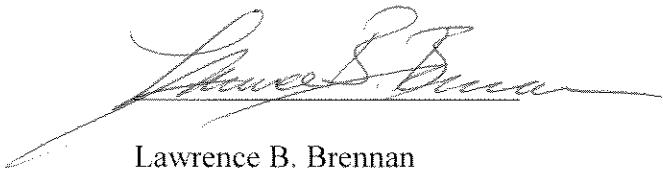
Exhibit M Correspondence with the Court and Parties Regarding Damages Documentation

Exhibit N Rundorf Document Index

Exhibit O Excerpts from 2008 Tax Returns of Nina, Katherine and Alexa Rundorf

Exhibit P Deposition Excerpt, Ms. Nina Rundorf

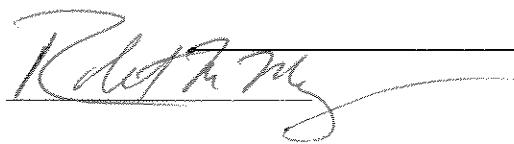
WHEREFORE, it is respectfully requested that the Court grant the Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, the Motion for Partial Summary Judgment on Damages, and the Motion for Partial Summary Judgment, filed on behalf of the New York Rowing Association and the Peter J. Sharp Boathouse, and grant the Rowing Association and the Boathouse such other and further relief as may be just and proper.



Lawrence B. Brennan

Sworn to before me

this 28 day of September, 2011.



Notary Public

Robert M. Mazzei
Notary Public, State of New York
No. # 02MA6201061
Qualified in Nassau County
Commission Expires in 02/17/2013

CERTIFICATE OF SERVICE

I, Brooke Travis, hereby certify that I electronically filed the attached Attorney's Affidavit of Lawrence B. Brennan in Support of the Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, the Motion for Partial Summary Judgment on Damages, and the Motion for Partial Summary Judgment, filed on behalf of the New York Rowing Association and the Peter J. Sharp Boathouse, with the Clerk of the Court using the CM/ECF system which will send notification of such filing electronically to the following:

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/s/ Brooke Travis